

# EXHIBIT A

Declaration of Andreas Alkiviades Andreou

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6 | Attorneys for Defendants Frank Petosa, Ryan Hogan, Michael Woodside and Aylo Premium Ltd

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

0 MELISSA HUTCHISON aka PHOENIX MARIE, an individual.,

Plaintiff,

V.

4 ETHICAL CAPITAL PARTNERS, a foreign  
entity; AYLO PREMIUM LTD., a foreign  
corporation; DM PRODUCTIONS, a foreign  
entity; DIGITAL PLAYGROUND, a foreign  
entity; MIND GEEK USA  
5 INCORPORATED, a foreign entity; MG  
PREMIUM LTD, a foreign entity; DM  
PRODUCTIONS, a foreign entity; DIGITAL  
PLAYGROUND, a foreign entity; DANNY  
6 MARTIN aka DANNY D, an individual;  
FRANK PETOSA an individual; RYAN  
7 HOGAN, an individual; MICHAEL  
WOODSIDE, an individual; and DOES 1  
8 through 50.,

Defendants.

Case No. 2:24-cv-00673-GMN-BNW

**DECLARATION OF ANDREAS  
ALKIVIADES ANDREOU IN SUPPORT  
OF AYLO PREMIUM LTD'S MOTION  
TO DISMISS PLAINTIFF'S FIRST  
AMENDED COMPLAINT**

I, Andreas Alkiviades Andreou, hereby declare as follows:

4        1. I am employed by Aylo CY Holdings Ltd as Director of Corporate Finance, a  
5 position which I have held since 2013. I have also served as a Class A manager (the equivalent of  
6 a director) for Aylo Holdings S.à.r.l. since 2016. Through my employment and experience, I am  
7 familiar with the corporate structure and operations of Aylo Premium Ltd (which was formerly

1 known as MG Premium Ltd) (“Aylo”). Almost every day, as part of my regular job responsibilities,  
2 I deal with issues involving the corporate structure of Aylo in some capacity.

3       2. Unless otherwise stated, I make this declaration of the following facts from my direct,  
4 personal knowledge, and would competently testify thereto if called as a witness.

5       3. I have reviewed the First Amended Complaint (“FAC”) filed in the instant action and  
6 I am familiar with the allegations made therein.

7       4. Aylo is a limited liability company organized and operating under the laws of the  
8 Republic of Cyprus, having its head office at 195-197 Old Nicosia-Limassol Road, Block 1 Dali  
9 Industrial Zone, Cyprus.

10        5. Aylo does not have any offices or employees in Nevada or in the United States and  
11 is not registered to do business in Nevada or any other state in the United States. Aylo does not  
12 have United States-based operations, a United States mailing address or phone number, United  
13 States bank accounts, designated agents in the United States, or United States employees. Aylo has  
14 never filed a lawsuit in Nevada (or anywhere else in the United States for that matter).

15        6. Aylo entered into a Performer Services Agreement with Plaintiff Melissa Hutchison,  
16 dated October 1, 2023. The Performer Services Agreement was negotiated, pursuant to an  
17 intercompany services agreement, by a corporate affiliates of Aylo in Montreal, Canada and signed  
18 by Aylo from Cyprus. A true and correct copy of the Performer Services Agreement is attached  
19 hereto as **Exhibit B**.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

22 | Executed this 23<sup>rd</sup> day of August, 2024

/s/ Andreas Alkiviades Andreou  
Andreas Alkiviades Andreou